

201-15637

September 29, 2004

Mr. Mike Leavitt, Administrator
Acting Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attn: Chemical Right-to-Know Program

RECEIVED
SEP 30 2004
EPA/600/3-04/001

Re: HPV Challenge Program – Registration

Dear Mr. Leavitt:

The ADBAC Steering Committee/Joint Venture (AJV), operating under the aegis of the Consumer Specialty Products Association (CSPA), member's list attached, is writing to notify you that on September 29, 2003, EPA was notified that it was necessary to change our commitment to submit robust summaries and the test plan for the EPA High Production Volume Chemical (HPVC) program. The reason for the change was due to the continuing confusion regarding data protection rights under the Biocidal Products Directive in Europe and the potential for data submitted to EPA in support of the HPV program to be used by a third party for registration in Europe without justified compensation to the ADBAC Joint Venture.

Please do not hesitate contacting Ms. Susan E. Little, Executive Director, PIR Program, CSPA, at 202/833-7315 or by email: slittle@cspa.org if you have questions regarding this matter.

Sincerely,

Christopher A. Cart
President / Chief Operating Officer
for the ADBAC Joint Venture

Attachment

cc: ADBAC Joint Venture Members

ADBAC JOINT VENTURE MEMBERS
September 25, 2003

Ecolab, Inc.
St. Paul, MN 55102

Lonza, Inc.
Fair Lawn, NJ 07410

Mason Chemical Co.
Arlington Heights, IL 60005

Stepan Company
Northfield, IL 60093

Goldschmidt Inc.
Hopewell, VA 23860